



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
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DIVISION OF
ENFORCEMENT

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October 14, 2021

VIA ECF

The Honorable Cathy L. Waldor
United States Magistrate Judge
United States District Court
District of New Jersey
Martin Luther King Building Courthouse
50 Walnut Street, Room 4040, Courtroom 4C
Newark, NJ 07101

Re: SEC v. Vuuzle Media Corp., et al.; Case No. 2:21-cv-01226 (D.N.J.)

Dear Judge Waldor:

We write to present the following joint briefing schedule on the SEC's ability to share information pursuant to delegated authority as requested by your Honor during the hearing on October 12, 2021:

October 20, 2021 – SEC files its Memorandum in Further Support of its Motion for Protective Order;

October 27, 2021 – Vuuzle files its Opposition; and

November 1, 2021 – SEC files its Reply.

The SEC has met and conferred with counsel for Vuuzle, who agrees with this proposed schedule. In addition, the parties will be available for any oral argument requested by the Court on a date to be scheduled by the Court.

Respectfully Submitted,

/s/ Devon Staren

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CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2021, I served a copy of the foregoing upon all counsel of record using this Court's ECF system, and upon Defendant Flynn using the email rflynn48@gmail.com.

/s/ *Devon Staren*
Counsel for Plaintiff